



## WASTE MANAGEMENT

W132 N10487 Grant Drive  
Germantown, Wisconsin 53022

March 16, 2018

ATTORNEY-CLIENT PRIVILEGE

Ms. Rebecca Wenner, Physical Scientist  
U.S. Environmental Protection Agency  
Region 7 Kansas, Missouri, Iowa, Nebraska  
Air & Waste Management Division  
11201 Renner Blvd.  
Lenexa, KS 66219

RE: 1220 Steuben Street Removal  
Management of Special Wastes

RECEIVED  
MAR 16 2018  
AWMD/WEMM

Dear Ms. Winner:

Thank you for a good meeting on February 15, 2018 to discuss the basic approach that Waste Management of Iowa will take to address disposal or recycle of the waste materials left at the 1220 Steuben Street, Sioux City, Iowa facility by Siouxland PC and Electronic Recycling LLC. I outlined how Waste Management intends to categorize and dispose of solid, special and hazardous waste that is at the facility. As I explained, there are large amounts of "mixed waste" in containers and piled both inside and outside the building in the form of televisions, televisions in consoles, monitors, computers, keyboards, and other e-waste with dirt, wood, cardboard and plastic etc. and which Waste Management intends to dispose of as special waste in its Dickinson County Landfill in Spirit Lake, Iowa. The landfill is authorized to accept special waste.

As you can see from the attached, IDNR "Out of Planning Area Waste Flow Tracking" form, the Sioux City Solid Waste Comprehensive Planning Area has released the waste for disposal at Dickinson as opposed to the solid waste planning area designated landfill. The next and final step for finalizing the plan to dispose of the mixed waste as special waste at Dickinson is to satisfy the request of Susan Johnson of IDNR that Waste Management obtain written approval from EPA that states the mixed waste that includes CRTs, keyboards, etc. (as described on the attached form) may be landfilled. IDNR would follow with completion of its approval process for disposal of the mixed waste at Dickinson. IDNR has requested this because EPA is taking the lead on cleanup of the Steuben Street facility and because Iowa is not delegated the RCRA program. Please note, as we discussed at the February meeting, the containers or piles of mixed waste have only insignificant, if any, crushed CRT glass.

I am writing to ask for this EPA approval while EPA and Waste Management work out the CAFO language because what Waste Management proposes for work plan components of the CAFO is dependent on the special waste disposal in Dickinson. I would greatly appreciate your review and written approval for disposal of the mixed waste as described above and on the attached IDNR form in the Dickinson County Landfill.

I would be happy to discuss this with you and will call you to provide any further details you may want.

Sincerely,

Gerard M. Hamblin, PE  
Area Engineer

RCRA



571235







## Out of Planning Area Waste Flow Tracking

Iowa Administrative Code (IAC) 567-101.4 states that if a city or county facility refuses any particular solid waste type for management or disposal, the city or county facility must identify another waste management facility for that waste within the planning area. In the case of special waste, if no other waste management facility for that waste type exists within the planning area, the city or county must, in cooperation with the waste generator, establish or arrange for access to another waste management facility. Municipal solid waste sanitary disposal projects are required to maintain written approval from both the department and the planning area of origin in order to accept any Iowa-generated waste from outside the planning area. The following information is intended to satisfy the requirements of IAC 567-101.4.

### Solid Waste Refusal:

Name of sanitary disposal project, e.g. landfill or transfer station, refusing solid waste type:

Gill Landfill, Nebraska

Solid waste comprehensive planning area of waste origin:

Sioux City Planning Area

Solid waste type: A combination of tv's, wood, plastic, dirt, computers, keyboards etc. mixed together in piles.

Waste generator, if known: Recycletronics; abandoned, site owned by Waste Management (WM). WM working w/EPA.

Solid waste quantity and timeframe, if known: 500 tons (preliminary estimate) limited access

Sanitary disposal project where access has been established or arranged for waste disposal (name, address):

Dickinson County Landfill, owned and operated by Waste Management of Iowa, Inc. 2575 190th Street, Spirit Lake, IA 51360

Name	Position	Date
Gerard Hamblin	Area Engineer	2/23/18

### Solid Waste Comprehensive Planning Area of Waste Origin Approval:

As the responsible official for the solid waste comprehensive planning area where the waste originated, I certify that no other waste management facility for the waste exists within the planning area, and in cooperation with the waste generator, access to the sanitary disposal project listed above has been arranged.

Signature of Responsible Official: *Melissa Campbell*, ENVIRONMENTAL SERVICES

Printed Name: MELISSA CAMPBELL

Phone: 712-899-5776

Once the portions above are completed and signed, please email, fax or send to:

Leslie Goldsmith, Land Quality Bureau, 502 E 9<sup>th</sup> St, Des Moines IA 50319, Email: [Leslie.Goldsmith@dnr.iowa.gov](mailto:Leslie.Goldsmith@dnr.iowa.gov), or Fax: 515-725-8202.

### Iowa Department of Natural Resources Approval:

The DNR approves of solid waste generated outside of the planning area of origin being accepted by the sanitary disposal project listed. Solid waste received from outside of the planning area of origin must be properly recorded on the Quarterly Solid Waste Fee Schedule and Retained Fees Report.

Signature of DNR Approval:

Date:

Printed Name:

Phone: